

EXHIBIT 38

[handwritten:] # 177513

RESPONSE TO OMNIBUS OBJECTION

I. CONTACT INFORMATION

Name: Carmen Alicia Santiago Duco

[stamp:] RECEIVED 2022 JUN 13 [illegible]

Mailing Address Urb. Parque del Rio Calle Yahueca

Casa A-16 Caguas, PR 00725

Contact Home Phone: 787-743-0192 Cell _____

II. Caption

A. Clerk's Office

United States District Court
Room 150 Federal Building
San Juan Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al. (Debtors)

C. Case Number: 17 BK 3283 – LTS

D. Omnibus Objection regarding amounts not paid by the Commonwealth of Puerto Rico:

Evidence by proof of claim numbers:

Act 129 – 1973 Pay raise

Act 89 – 1979 - Uniform Compensation

#49762 – Act 89 – Romerazo – Effective July 1, 1995

#94057 – June 6, 2008 Pay Scale Act – Step Increases

#96621 – Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila Calderón – effective January 2004

III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 129 – 1973 Pay raise

Act 89 – 1979 - Uniform Compensation

Act 89 “Romerazo” – Effective July 1, 1995

June 6, 2008 Pay Scale Act – Step Increases

Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila M. Calderón, effective January 2004

IV. Supporting Documentation

Enclosed are documents evidencing my years of service with the Puerto Rico Telephone Company, Ponce, Puerto Rico, from the 24th of August of 1971 through the 1st of March of 1999. I ended my career as a Regular PRTC Employee with the Puerto Rico Telephone Company, ~~Ponce~~ Caguas, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of ~~educational~~ service.

Enclosed are documents in support of this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

Carmen A. Santiago Duco

Printed name

[signature]

Signature

PS

To whom it may concern:

I will tell you a bit more, I am Carmen Alicia Santiago Duco, I began working August 24, 1971 CCPR of the Commonwealth of Puerto Rico, and I ended my career on March 1, 1999 at the PRTC of the Commonwealth of Puerto Rico. I am making this claim because I know that it is unfair for them to say that I am not in said claim for laws that were passed during the period I worked for the Commonwealth of Puerto Rico. When I began at the agency that at the time was called the Communication Authority of the Commonwealth of Puerto Rico, later its name was changed to the communication corporation of the Commonwealth of Puerto Rico in 1974, when I began at the agency, later the name was changed to the PRTC of the Commonwealth of Puerto Rico. I worked for the PRTC for 28 years, during that time I qualified for three of the Laws. Act 124-1973 pay raise, Act 89-1979 Uniform compensation, Act 89-1995 The *Romerazo*, said laws were enacted while I was working for the PRTC of the Commonwealth of Puerto Rico.

For these reasons, I do not agree with my claim being cancelled, because the basis or reasons for my claims relate to money owed under certain laws that were enacted during the period that the PRTC of the Commonwealth of Puerto Rico was an agency that belonged to the Commonwealth of Puerto Rico.

Thank you for your attention.

Sincerely,



PRT/CLARO
P.O. Box 360998
San Juan PR 00936-0998

CERTIFICATION

CARMEN ALICIA SANTIAGO DUCOS

XXX-XX-2102

For the former employee referenced above, we certify the following:

- She joined CCPR effective 08/24/1971.
- She joined PRT/Claro effective 05/05/1994.
- She worked as a regular employee through 03/01/1999.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on 6/2/2022.

González

Abigail Alejandro

Abigail Alejandro González
Compensation Officer
Compensation and Records

Carmen A. Santiago
Urb. Parque del Río
Calle Yahueca
A-16 Caguas, P.R. 00725



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Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

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TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 177513 DN 21238**

Signed this 13th of July 2022



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

